

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
CIVIL ACTION

LASHEENA SIPP-LIPSCOMB and :
ANDRES GARDIN, SR., Individually and in their :
own right and as Parents and Natural Guardians of :
A G, JR., a Minor :

V. :

NO. 2:20-cv-01926

EINSTEIN PHYSICIANS PENNYPACK :
PEDIATRICS and :
ALBERT EINSTEIN HEALTHCARE NETWORK :
and AGENT DOE and :
ST. CHRISTOPHER'S HEALTHCARE, LLC :
f/k/a and/or f/d/b/a St. Christopher's Hospital for :
Children and :
AMERICAN ACADEMIC HEALTH SYSTEM, :
LLC f/k/a and/or f/d/b/a St. Christopher's Hospital :
for Children and :
PHILADELPHIA ACADEMIC HEALTH :
HOLDINGS, LLC f/k/a and/or f/d/b/a :
St. Christopher's Hospital for Children and :
PHILADELPHIA ACADEMIC HEALTH :
SYSTEM, LLC f/k/a and/or f/d/b/a :
St. Christopher's Hospital for Children and :
HAYLEY BARTKUS a/k/a HAYLEY BARKUS :
and ERIN E. HASSEL, M.D. and :
PRAMATH NATH, M.D. and :
UROLOGY FOR CHILDREN, LLC and :
CHARLES W. CONCODORA, M.D. and :
and ERIC Y. CHO, M.D. and :
ARJUN KALYANPUR, M.D. and :
TELERADIOLOGY SOLUTIONS, P.C. :

**JURY TRIAL DEMANDED
BY ERIC Y. CHO, M.D.**

PROPOSED VERDICT SHEET OF DEFENDANT, ERIC Y. CHO, M.D.

Defendant, Eric Y. Cho, M.D., by and through his attorneys, Marshall Dennehey Warner
Coleman & Goggin, hereby submit the following proposed verdict sheet.

QUESTION 1

Did the conduct of any of the following Defendant(s) fall below the applicable standard of care in their treatment of the Minor?

- | | | | |
|----|---|-----------|-----------|
| a) | Einstein Physicians Pennypack
Pediatrics | _____ Yes | _____ No |
| b) | St. Christopher's Hospital for
Children | _____ Yes | _____ No. |
| c) | Hayley Bartkus | _____ Yes | _____ No |
| d) | Erin E. Hassel, M.D. | _____ Yes | _____ No |
| e) | Pramath Nath, M.D. | _____ Yes | _____ No |
| f) | Charles W. Concordora, M.D. | _____ Yes | _____ No |
| g) | Eric Y. Cho, M.D. | _____ Yes | _____ No |
| h) | Arjun Kalyanpur, M.D. | _____ Yes | _____ No |

If your answer to Question No. 1 is "No" as to all Defendants, Plaintiffs cannot recover and you should return to the courtroom. If you answered "Yes" as to one or more of the Defendants, proceed to Question No. 2.

QUESTION 2

Was the conduct of the Defendant(s) a substantial factor in causing the Minor's injuries? Answer as to only those Defendants to which you answered yes in question 1.

- | | | | |
|----|---|-----------|-----------|
| a) | Einstein Physicians Pennypack
Pediatrics | _____ Yes | _____ No |
| b) | St. Christopher's Hospital for
Children | _____ Yes | _____ No. |
| c) | Hayley Bartkus | _____ Yes | _____ No |
| d) | Erin E. Hassel, M.D. | _____ Yes | _____ No |
| e) | Pramath Nath, M.D. | _____ Yes | _____ No |
| f) | Charles W. Concordora, M.D. | _____ Yes | _____ No |

- g) Eric Y. Cho, M.D. _____ Yes _____ No
- h) Arjun Kalyanpur, M.D. _____ Yes _____ No

If your answer to Question No. 2 is "No" as to all Defendants, Plaintiffs cannot recover and you should return to the courtroom. If you answered "Yes" as to any Defendant in Question No. 2, proceed to Question No. 3.

QUESTION 3

Were the Plaintiffs comparatively negligent?

_____ Yes _____ No

If yes, go to Question No. 4. If you answered no to question 3, go to question 5.

QUESTION 4

Was the Plaintiffs' comparative negligence a substantial factor in causing the Minor's injuries?

_____ Yes _____ No

Proceed to Question No. 5.

QUESTION 5

Taking the combined negligence that was a substantial factor in causing harm to the Plaintiffs as 100% what percentage of that negligence do you attribute to each party for whom you responded "Yes" in Question 3:

- a) Einstein Physicians Pennypack Pediatrics _____ Yes _____ No
- b) St. Christopher's Hospital for Children _____ Yes _____ No.
- c) Hayley Bartkus _____ Yes _____ No
- d) Erin E. Hassel, M.D. _____ Yes _____ No
- e) Pramath Nath, M.D. _____ Yes _____ No
- f) Charles W. Concordora, M.D. _____ Yes _____ No

g) Eric Y. Cho, M.D. _____ Yes _____ No

h) Arjun Kalyanpur, M.D. _____ Yes _____ No

Answer as to the Plaintiffs only if you answered "Yes" to Question No. 4

h) Plaintiffs _____ %

Total _____ 100 %

Proceed to Question No. 7.

QUESTION 6

Do you find that the following Defendants were acting as agents of St. Christopher's Hospital for Children?

a) Hayley Bartkus _____ Yes _____ No

b) Erin E. Hassel, M.D. _____ Yes _____ No

c) Pramath Nath, M.D. _____ Yes _____ No

d) Charles W. Concordora, M.D. _____ Yes _____ No

e) Eric Y. Cho, M.D. _____ Yes _____ No

f) Arjun Kalyanpur, M.D. _____ Yes _____ No

QUESTION 7

Do you find that Defendant, Charles W. Concordora, M.D., was acting as the agent of Urology for Children, LLC?

_____ Yes _____ No

QUESTION 9

Do you find that Defendant, Arjun Kalyanpur, M.D., was acting as the agent of Teleradiology Solutions, P.C.?

_____ Yes _____ No

State the amount of damages compensable to Plaintiffs: \$ _____

YOU SHOULD SIGN THE VERDICT SHEET AND RETURN TO THE COURTROOM

Date: _____

JURY FOREPERSON

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CERTIFICATE OF SERVICE

I, Jacqueline M. Reynolds, Esquire, do hereby certify that a true and correct copy of the
Proposed Verdict Sheet of Defendant, Eric Y. Cho, M.D., was electronically filed with the

Court on the date listed below and is available for viewing and downloading from the ECF System.

MARSHALL DENNEHEY WARNER
COLEMAN AND GOGGIN

BY: Jacqueline M. Reynolds
E. CHANDLER HOSMER, III, ESQUIRE
JACQUELINE M. REYNOLDS, ESQUIRE
Attorney ID No.: 28499 / 79769
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Email: echosmer@mdwcg.com/jmreynolds@mdwcg.com

Date: January 17, 2023